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July 14, 2025

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Pamela K. Chen, U.S.D.J.
225 Cadman Plaza East
Courtroom 4F North
Brooklyn, NY 11201-1804

Re: IME WatchDog, Inc. v. Gelardi, et al.
Case No.: 1:22-cv-1032 (PKC) (JRC)

Dear Judge Chen:

This firm, together with Milman Labuda Law Group PLLC, represents Plaintiff IME WatchDog, Inc. (the “Plaintiff”) in the above-referenced case. Plaintiff writes to respectfully request an extension of time, until Friday, July 18, 2025, of the deadline to oppose Defendants Safa Gelardi (“Safa”) and Vito Gelardi’s (“Vito”) (Safa and Vito collectively hereinafter the “Gelardis”) motions to compel discovery and to unseal documents. See ECF Docket Entries [543](#) & [544](#).

Consistent with ¶ 1(G) of this Court’s Individual Practices and Rules, Plaintiff respectfully submits that: (i) the current deadline to oppose the motions is today, July 14, 2025; (ii-iii) there have been no previous requests for an extension of time concerning these deadlines; (iv) Plaintiff was unable to earlier request the Gelardis’ consent for an extension of time of this deadline; and (v) the requested extension does not affect any other scheduled Court appearance or deadline to the Plaintiff’s knowledge.

The reason for the request is that both undersigned counsel for Plaintiff were away on vacation, with Mr. Felsen away for over a week and Mr. Kataev away since Thursday, July 10, 2025, such that Plaintiff did not have a sufficient opportunity to prepare its opposition to the two separate motions. Between Mr. Felsen catching up upon his return from an extended period away from the office and Mr. Kataev in Richmond County Supreme Court for an appearance this morning, Plaintiff respectfully submits that it was unable to earlier seek consent for an extension of time. Further, Plaintiff and the Gelardis are expected to meet-and-confer concerning the Gelardis’ motions on or before July 17, 2025. Accordingly, the requested extension of time until Friday, July 18, 2025 is warranted.

As a result, Plaintiff respectfully submits that good cause exists for an extension of time for Plaintiff to oppose the Gelardis’ motions. See Fed. R. Civ. P. 6(b)(1).

Dated: Lake Success, New York
July 14, 2025

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s/ Jamie S. Felsen, Esq.

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*Attorneys for Plaintiff
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Dated: Lake Success, New York
July 14, 2025

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All counsel of record